



Public Schools of North Carolina

Title I Comparability

October 26, 2018
NCACE presentation

Comparability Defined

- Section 1118(c)(1)(A) of the ESEA provides that an LEA may receive Title I, part A funds only if it uses state and local funds to provide services in Title I schools that, taken as a whole, are at least comparable to the services provided in schools that are not receiving Title I funds.
- If the LEA serves all of its schools with Title I funds, the LEA must use state and local funds to provide services that, taken as a whole, are substantially comparable in each Title I School. [Section 1118(c)(1)(B)]



Comparability Requirements

- LEAs must conduct comparability calculations annually to demonstrate comparability – Data from October 2018.
- LEAs must maintain records of comparability documentation.
- LEAs will submit comparability reports annually to the SEA.



Comparability and Reporting

- Comparability is reported through CCIP – Title I related documents
- Assurance forms A-D will be available in a workbook format
- Prior to submission, remove all forms not chosen by LEA for reporting

Due Date – December 1, 2017



Comparability Exemptions

The comparability requirement does not apply to:

- A school with 100 or fewer students
- An LEA with only one school for each grade span
- A school with no comparison school in the same grade span grouping by enrollment size.



Comparability Exclusions

- An LEA must exclude any resources paid with federal funds and private funds.
- An LEA may exclude state and local funds expended for bilingual education for English Learners, excess costs for providing services to students with disabilities, or supplemental state or local funds used to meet the intent and purpose of Title I.



Comparability Reminders

- Exempt and Non-Exempt LEAs must complete and submit the Comparability Assurance in CCIP
- LEAs are not required to include unpredictable changes in student enrollment or personnel assignments after selected point in time.
- LEA funded alternative schools and charter schools must be included in respective grade span
- A school that falls into more than one grade span may be compared to school type.



Instructional Staff

Each LEA determines the definition of instructional staff.

Definitions can include:

- Certified classroom teachers including art, music, physical education, and others providing direct instruction to students.
- Guidance counselors, speech therapists, media specialists, social workers, psychologists, and others providing support services that impact instruction.



Key Points

- The selection of instructional staff must be consistent between Title I and non-Title I schools
- Staff salary differentials for years of employment are not included in comparability determinations.
- Note: Consider carefully whether a paraprofessional supported with state and local funds should be considered equivalent to a teacher or other instructional staff.



Pathway A

- Must have the following policies [1118(c)(2)]:
 - A local educational agency-wide salary schedule (1118(c)(2)(A)(i))
 - A policy to ensure equivalence among schools in teachers, administrators, and other staff (1118(c)(2)(A)(ii))
 - A policy to ensure equivalence among schools in the provision of curriculum materials and instructional supplies (1118(c)(2)(A)(iii))



Title I Comparability Local Educational Agency Coversheet

Fiscal Year

LEA Code

Name of LEA

Prepared by

Title

Telephone

E-mail Address

Comparability Pathway A

Local educational agency-wide salary schedule	
Policy to ensure equivalence among schools in teachers, administrators, and other staff	
Policy to ensure equivalence among schools in the provision of curriculum materials and instructional supplies	

If you answer "yes" to each of the documents in Pathway A, then comparability has been established. Documents must be uploaded, along with this coversheet, into CCIP as documentation.

Original Report Date	
Revised Report Date	
Exempt / Not Exempt	

Signature of LEA Assurance Representative

Typed Name

Title

Date



Pathway B

	Form A Title I and Non-Title I Schools Compared Student Enrollment to Instructional Staff	Form B Title I and Non-Title I Schools Compared Student Enrollment to Instructional Staff Salary	Form C Title I Schools Compared Student Enrollment to Instructional Staff	Form D Title I Schools Compared Student Enrollment to Instructional Staff Salary
Option 1 Grade Span Compared: <ul style="list-style-type: none"> Elementary Middle High 	Title I and Non-Title I Schools Elementary to Elementary Middle to Middle High to High	Title I and non-Title I Schools Elementary to Elementary Middle to Middle High to High	All Title I Schools Elementary to Elementary Middle to Middle High to High	All Title I Schools Elementary to Elementary Middle to Middle High to High
Option 2 <ul style="list-style-type: none"> Large Schools Compared Small Schools Compared 	Title I and non-Title I Schools Large to Large Small to Small	Title I and non-Title I Schools Large to Large Small to Small	All Title I Schools Large to Large Small to Small	All Title I Schools Large to Large Small to Small



Title I Comparability Local Educational Agency Coversheet

Fiscal Year

LEA Code

Name of LEA

Prepared by

Title

Telephone

E-mail Address

Comparability Pathway A

Local educational agency-wide salary schedule	<input type="text"/>
Policy to ensure equivalence among schools in teachers, administrators, and other staff	<input type="text"/>
Policy to ensure equivalence among schools in the provision of curriculum materials and instructional supplies	<input type="text"/>

If you answer "yes" to each of the documents in Pathway A, then comparability has been established. Documents must be uploaded, along with this coversheet, into CCIP as documentation.

Original Report Date	<input type="text"/>
Revised Report Date	<input type="text"/>
Exempt / Not Exempt	<input type="text"/>

Signature of LEA Assurance Representative

Typed Name

Title

Date



Title I Comparability Local Educational Agency Coversheet

Fiscal Year

LEA Code

Name of LEA

Prepared by

Title

Telephone

E-mail Address

Comparability Pathway A

Local educational agency-wide salary schedule	<input type="text"/>
Policy to ensure equivalence among schools in teachers, administrators, and other staff	<input type="text"/>
Policy to ensure equivalence among schools in the provision of curriculum materials and instructional supplies	<input type="text"/>

If you answer "yes" to each of the documents in Pathway A, then comparability has been established. Documents must be uploaded, along with this coversheet, into CCIP as documentation.

Original Report Date	<input type="text"/>
Revised Report Date	<input type="text"/>
Exempt / Not Exempt	<input type="text"/>

Signature of LEA Assurance Representative

Typed Name

Title

Date



Title I Comparability Local Educational Agency Coversheet

Fiscal Year

LEA Code

Name of LEA

Prepared by

Title

Telephone

E-mail Address

Comparability Pathway A

Local educational agency-wide salary schedule		
Policy to ensure equivalence among schools in teachers, administrators, and other staff		
Policy to ensure equivalence among schools in the provision of curriculum materials and instructional supplies		

If you answer "yes" to each of the documents in Pathway A, then comparability has been established. Documents must be uploaded, along with this coversheet, into CCIP as documentation.

Original Report Date	
Revised Report Date	
Exempt / Not Exempt	

Signature of LEA Assurance Representative

Typed Name

Title



Title I Comparability Local Educational Agency Coversheet

Fiscal Year

LEA Code

Name of LEA

Prepared by

Title

Telephone

E-mail Address

Comparability Pathway A	
Local educational agency-wide salary schedule	<input type="text"/>
Policy to ensure equivalence among schools in teachers, administrators, and other staff	<input type="text"/>
Policy to ensure equivalence among schools in the provision of curriculum materials and instructional supplies	<input type="text"/>

If you answer "yes" to each of the documents in Pathway A, then comparability has been established. Documents must be uploaded, along with this coversheet, into CCIP as documentation.

Original Report Date	<input type="text"/>
Revised Report Date	<input type="text"/>
Exempt / Not Exempt	<input type="text"/>

Signature of LEA Assurance Representative

Typed Name

Title

Date



Comparability Completion

- All is defined as grade spans receiving Title I funds
- Large school is 450 students or more
- Comparability is a prerequisite for receiving Title IA funds (section 1118(c)(1)(A))
- Data for report pulled from October 2018.
- Comparability Report is due December 1, 2018



Dr. Tina Hinson
NCDPI Federal Program Administrator
Charter Schools-East

tina.hinson@dpi.nc.gov

919.807.3958

